

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

MAYOR AND CITY COUNCIL OF
BALTIMORE, *et al.*,

Plaintiffs,

vs.

CONSUMER FINANCIAL
PROTECTION BUREAU, *et al.*,

Defendants.

Case No. 1:25-cv-00458-MJM

NOTICE OF SUPPLEMENTAL DECLARATIONS

Plaintiffs Mayor and City Counsel of Baltimore and Economic Action Maryland Fund submit this notice to provide the Court with additional information bearing on its consideration of Plaintiffs' pending motion for a preliminary injunction.

In parallel litigation currently ongoing in the U.S. District Court for the District of Columbia, *see National Treasury Employees Union v. Vought*, No. 1:25-cv-00381 (D.D.C.), the plaintiffs yesterday submitted several declarations with direct relevance to the issues before this Court. These issues specifically include the question (which Defendants here have not directly denied) whether Defendant Vought made a decision to transfer the CFPB's operating funds beyond its control.

In a declaration from a federal employee submitted pseudonymously by "Blake Doe," because the declarant feared retaliation, the declarant stated: "On February 13th, 2025, I was present at a meeting, at which CFPB Chief Operating Officer Adam Martinez explained that the CFPB was in 'wind down mode.'" Doe Decl. ¶ 3. "Wind down mode," the declarant explains, will mean effectively terminating the CFPB. The declarant further

states that: “I have seen an email dated February 11, 2025, in which Mr. [Adam] Martinez[, the CFPB’s chief operating officer,] stated that Chief Financial Officer Jafnar Gueye was in communications with the Federal Reserve about how to return money to either the Federal Reserve or the Treasury.” *Id.* ¶ 5.

A second declaration, from the chief of staff of the Office of Consumer Response, the CFPB office responsible for handling consumer complaints, details at length the damage already done to the agency’s complaint function. *See* Pfaff Decl. ¶¶ 10-26. Among other issues caused by Defendants’ actions, the declarant describes an unprecedented backlog of over 10,000 complaints awaiting review that are not being processed, with some complaints not being addressed at all. *Id.* ¶¶ 12-13, 16.

Dated: February 28, 2025

Respectfully submitted,

/s/ Mark B. Samburg

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